

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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	:	
NVR, INC., a Virginia corporation,	:	<b>ECF CASE</b>
	:	
Plaintiff,	:	Civ A. No. 15-cv-05059-NLH-
	:	KMW
- against -	:	
	:	
JONATHAN DAVERN, an individual,	:	<b>NOTICE OF MOTION TO</b>
	:	<b>STRIKE OR DISMISS</b>
Defendant.	:	<b>DEFENDANT’S</b>
	:	<b>COUNTERCLAIMS</b>
	:	
	:	<b>(Oral Argument Requested)</b>
		<b>Motion Date: April 4, 2016</b>

TO: Edward T. Kang  
KANG HAGGERTY & FETBROYT LLC  
123 S. Broad Street  
Suite 1670  
Philadelphia, PA 19109

PLEASE TAKE NOTICE that on Monday, April 4, 2016, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff NVR, Inc. (“NVR”) will move before the Honorable Noel L. Hillman, United States District Judge, at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey for an Order striking or dismissing the counterclaims filed by Defendant Jonathan Davern (“Defendant”).

PLEASE TAKE FURTHER NOTICE that, in support of this motion, NVR shall rely upon the accompanying Memorandum of Law in Support of NVR's Motion to Strike or Dismiss Defendant's Counterclaims, which is filed herewith in accordance with L. Civ. R. 7.1(b) of the Local Civil Rules of the United States District Court for the District of New Jersey.

PLEASE TAKE FURTHER NOTICE, that at the time and place aforesaid, NVR will request that the proposed form of Order submitted herewith be entered by the Court.

Dated: March 11, 2016  
New York, New York

SEYFARTH SHAW LLP

By: s/ James S. Yu  
James S. Yu

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2016, I electronically filed the foregoing Notice of Motion to Strike or Dismiss Defendant's Counterclaims and Memorandum of Law in Support of Motion to Strike or Dismiss Defendant's Counterclaims, via the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ James S. Yu  
James S. Yu